

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

TWO-WAY MEDIA LLC,	§	NO. 5:09-cv-00476-OLG
	§	
Plaintiff,	§	
	§	
v.	§	JURY TRIAL DEMANDED
	§	
AT&T OPERATIONS, INC., et. al,	§	
	§	
Defendants.	§	

PLAINTIFF TWO-WAY MEDIA LLC'S EXPERT DESIGNATION

Pursuant to the Court's Amended Scheduling Order dated September 15, 2009, as amended by the Court's May 5, 2010 Stipulated Order, and the federal rules, Plaintiff Two-Way Media LLC ("TWM") designates the following expert witnesses:

1. Vernon Thomas Rhyne
8407 House Mountain Cove
Austin, TX 78746
(512) 327-116

Dr. Rhyne currently works as a consulting engineer doing computer systems design, application specific system design, and expert witness work in intellectual property litigation. He holds a Doctor of Philosophy degree in Electrical Engineering from the Georgia Institute of Technology and is an expert in the areas of electrical and computer engineering, including digital data transmission. Dr. Rhyne is expected to testify concerning Defendant's infringement of United States Patent Nos. 5,778,187; 5,983,005; 6,434,622 B1; 7,080,153; and 7,266,686 (collectively, the "TWM Patents"), the technology involved with the patents and AT&T's U-verse TV service, and the proper interpretation by one of ordinary skill in the art of certain claim terms contained in the TWM Patents. Dr. Rhyne's CV is attached hereto as Exhibit A. Dr.

Rhyne's expert report will be served on Defendants today. Plaintiff reserves the right to supplement as necessary.

2. James J. Nawrocki
IPFC Corp.
10000 Memorial Drive, Suite 300
Houston, TX 77024
(713) 335-5441

Mr. Nawrocki is a Certified Public Accountant and financial consultant. Mr. Nawrocki will offer opinions regarding various financial and damages issues pertaining to this matter. Mr. Nawrocki is expected to testify concerning the damages sustained by Plaintiff as a result of Defendants' infringement of TWM's Patents. Mr. Nawrocki's CV is attached hereto as Exhibit B. Mr. Nawrocki's expert report will be served on Defendants today. Plaintiff reserves the right to supplement as necessary.

Plaintiff reserves the right to call, at the time of trial, any expert witnesses designated by Defendants.

DATED: June 30, 2010

Respectfully submitted,

SUSMAN GODFREY L.L.P.

/s/ Rachel S. Black

Parker C. Folse, III

Attorney-in-charge

Washington State Bar No. 24895

Ian B. Crosby

Washington State Bar No. 28461

Rachel S. Black

Washington State Bar No. 32204

1201 Third Avenue, Suite 3800

Seattle, Washington 98101

Telephone: (206) 516-3880

Facsimile: (206) 516-3883

Max L. Tribble, Jr.
Texas State Bar No. 20213950
1000 Louisiana Street, Suite 5100
Houston, Texas 77002-5096
Telephone: (713) 651-9366
Facsimile: (713) 654-6666

ATTORNEYS FOR PLAINTIFF,
TWO-WAY MEDIA LLC

OF COUNSEL:

HEIM, PAYNE & CHORUSH, L.L.P.
Michael F. Heim
Texas State Bar No.: 09380923
Leslie V. Payne
Texas State Bar No.: 00784736
Micah J. Howe
Texas State Bar No.: 24048555
600 Travis St., Suite 6710
Houston, Texas 77002-2912
Telephone: (713) 221-2000
Facsimile: (713) 221-2021

CLEMENS & SPENCER
George H. Spencer, Jr.
Texas State Bar No. 18921001
Randolph P. Tower
Texas State Bar No. 20153000
Jeff Jowers
Texas State Bar No. 24012932
1300 Weston Centre
112 East Pecan
San Antonio, TX 78205
Telephone: (210) 227-7121

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of June, 2010, I electronically filed the forgoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Ricardo G. Cedillo – rcedillo@lawdcm.com *via Email*
Leslie J. Strieber, III – lstrieber@lawdcm.com
Mark W. Kiehne – mkiehne@lawdcm.com
DAVIS CEDILLO & MENDOZA, INC.
755 East Mulberry Avenue, Suite 500
San Antonio, TX 7812

David T. Pritikin – dpritikin@sidley.com *via Email*
Douglas I. Lewis – dilewis@sidely.com
Benedict Frey – bfrey@sidley.com
SIDLEY AUSTIN LLP
One South Dearborn Street
Chicago, IL 60603

AT&T Operations, Inc.; AT&T Services, Inc.; AT&T Internet Services; SBC Internet Services, Inc.; Southwestern Bell Telephone Company

/s/ Rachel S. Black
Rachel S. Black